

**BELDOCK LEVINE & HOFFMAN LLP**  
**99 PARK AVENUE, PH/26<sup>TH</sup> FLOOR**  
**NEW YORK, N.Y. 10016**

JONATHAN MOORE  
DAVID B. RANKIN  
LUNA DROUBI  
MARC A. CANNAN  
CYNTHIA ROLLINGS  
JONATHAN K. POLLACK  
HENRY A. DLUGACZ  
STEPHEN J. BLUMERT  
MYRON BELDOCK (1929-2016)  
LAWRENCE S. LEVINE (1934-2004)  
ELLIOT L. HOFFMAN (1929-2016)

TEL: (212) 490-0400  
FAX: (212) 277-5880  
WEBSITE: blhny.com

COUNSEL  
BRUCE E. TRAUNER  
PETER S. MATORIN  
KAREN L. DIPPOLD  
MARJORIE D. FIELDS  
EMILY JANE GOODMAN  
IJUSTICE, NYS SUPREME COURT, RET.  
FRANK HANDELMAN

May 27, 2025

REF: 8443.03

WRITER'S DIRECT DIAL:  
(212) 277-5825  
drankin@blhny.com

**VIA ECF ONLY**

Hon. James R. Cho  
United States District Court  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, NY 11201

**Re: Karnes et al., v. City of New York et al., 21-CV-4903 (E.D.N.Y.)**

You Honor:

As the Court is aware, we represent Plaintiffs in the above-captioned matter. We write at the Court's direction along with the defendants to suggest the following schedule to conclude discovery for Ms. Washam.

Supplemental Discovery Demands:	July 7, 2025
Close of Discovery (fact and expert):	November 7, 2025

The reason for the longer time period to make supplemental discovery demands is that plaintiffs intend to make specific demands to fill out the gaps in the *Sow v. City of New York et al.* discovery. To do that, it requires a near complete discovery review of the documents and depositions exchanged in that action. As Your Honor may recall that action produced dozens of depositions, thousands of pages of documents, and many many hours of videos related to the George Floyd Protests.

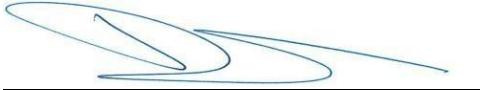
Additionally, we built out the schedule to account for counsels' vacation and trials. We

**BELDOCK LEVINE & HOFFMAN LLP**

Judge James R. Cho  
May 27, 2025  
Page 2

are optimistic this schedule will not require modification, and we can present a trial ready case for Your Honor this fall. The parties are continuing to discuss settlement and will not hesitate to reach out for a conference.

Respectfully submitted,



---

David B. Rankin  
Keegan Stephan  
Beldock Levine & Hoffman, LLP  
99 Park Ave., PH/26th Fl.  
New York, New York 10016

*Attorneys for Plaintiffs*

/s/

---

Elena Cohen  
J. Remy Green  
Cohen&Green P.L.L.C.  
*Attorneys for Plaintiffs*  
1639 Centre St., Suite 216  
Ridgewood, New York 11385